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February 1, 2022

The application for an extension is **GRANTED**. By **March 11, 2022**, Defendant shall file an answer or otherwise respond to the complaint. The Clerk of Court is respectfully directed to close the motion at Docket No. 10.

VIA ECF

Dated: February 2, 2022
New York, New York

Honorable Lorna G. Schofield
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 1106
New York, NY 10007



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: *Access Business Group International, LLC et al v. Refresco Beverages US Inc.*, No. 1:21-cv-10779-LGS.

Dear Judge Schofield:

We represent Defendant Refresco Beverages US Inc. (“Refresco”) in the above-captioned matter. We write pursuant to Local Rules 7.1(d) and 5.2(b) and Your Honor’s Individual Rule B.2 to respectfully request an extension of time until March 11, 2022 to answer or otherwise respond to the complaint. Counsel for Plaintiff, Edward J. Bardelli, consents to this request for an extension of time.

The current deadline to respond to the complaint is February 9, 2022. The parties have conferred and agree that additional time is needed to evaluate the case and the potential for resolution. There have been no prior requests for extension of time in this matter.

Respectfully,



Edwin M. Baum

cc: Edward Bardelli (Counsel for Plaintiff) via email